



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 2**

**290 BROADWAY**

**NEW YORK, NY 10007-1866**

**AUG 10 2009**

Gayle M. McKee  
C&S Engineers, Inc.  
90 Broadway  
Buffalo, New York 14203

Dear Ms. McKee:

The Environmental Protection Agency (EPA) has reviewed your June 22, 2009 draft final Environmental Assessment (EA) describing the planned improvements to the Runway Safety Areas at the Essex County Airport, Fairfield Township, New Jersey. The proposed action is to mitigate known obstructions to the navigable airspace to comply with the federal regulations (FAR Part 77, primary and approach surfaces) and current design standards and to correct runway safety area deficiencies. The preferred alternative evaluated by the Federal Aviation Administration (FAA) and Essex County Improvement Authority (ECIA) combines Alternative 3 from Runway Safety Area Alternatives and Alternative C from the obstruction removal alternatives.

The selected plan for the Essex County Airport removes all known obstructions to FAR Part 77 primary and approach surfaces and minimizes off airport impacts to adjacent property owners and potentially the environmental resources. To minimize the impact of obstruction removal to wetlands and wildlife resources on the airport property, Alternative C focuses on obstruction removal inside transitional surface areas and outside the wetlands. To further minimize the impact on wetlands, lights would be installed to mark the remaining obstructions. Alternative 3 provides a full safety area by displacing the runway thresholds, grading and clearing.

Although it is not required, we suggest that the carbon sink being lost with the removal of 21.4 acres of forested upland be compensated for in some way. Even relatively small offsets of greenhouse gas emissions can benefit a larger effort to address climate change. With regards to the conversion of forested wetlands to shrub/scrub wetlands EPA supports the option of purchasing mitigation credits through a Wetlands Mitigation Council of New Jersey approved wetland banker as stated in Section 4.13 Wetlands, page (4-24) Options 1-3.

As far as the Wetland Mitigation Bank Phase I operated by C&C Builders LLC and located on a 186.66 acre parcel in Fairfield Township, Essex County, the bank received a total of 54.46 mitigation credits for freshwater wetland creation and enhancement activities. The contact for the bank is Carmine Zammiello from C&C Builders and he may be reached at (973) 276-0080. However it is our understanding that this bank has no credits available for sale at this time so you may want to investigate other wetland bankers in the New Jersey area.

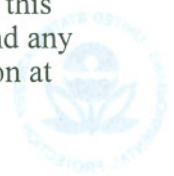
Thank you for the opportunity to comment. If you have any questions concerning this letter, please contact Charles Harewood of my staff at (212) 637-3753. Please send any future correspondence on this project directly to the Environmental Review Section at 290 Broadway, New York, NY, 10007-1866.

Sincerely yours,



Grace Musumeci, Chief  
Environmental Review Section  
Strategic Planning and Multi-Media Programs Branch

cc: M Jenet, FAA  
J. Staples, USDOJ Fish and Wildlife



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The Environmental Protection Agency (EPA) has reviewed your June 22, 2009 draft final Environmental Assessment (EA) describing the planned improvement to the runway safety area at the Essex County Airport, Fairfield Township, New Jersey. The proposed action is to mitigate known obstructions to the navigable airspace to comply with the federal regulations (FAR Part 75 primary and approach surfaces) and current design standards and to correct runway safety area deficiencies. The proposed alternative evaluated by the Federal Aviation Administration (FAA) and Essex County Improvement Authority (ECIA) combines Alternative 3 from Runway Safety Area Alternatives and Alternative C from the obstruction removal alternatives.

The selected plan for the Essex County Airport removes all known obstructions to FAR Part 75 primary and approach surfaces and minimizes off airport impacts to adjacent property owners and potentially the environmental resources. To minimize the impact of obstruction removal to wetlands and wildlife resources on the airport property, Alternative C focuses on obstruction removal inside transitional surface areas and outside the wetlands. To further minimize the impact on wetlands, lights would be installed to mark the remaining obstructions. Alternative 3 provides a full safety area by displacing the runway thresholds, grading and clearing.

Although it is not required, we suggest that the carbon sink being lost with the removal of 31.4 acres of forested upland be compensated for in some way. Even relatively small offsets of greenhouse gas emissions can benefit a larger effort to address climate change. With regards to the conversion of forested wetlands to shrub wetlands EPA supports the option of purchasing mitigation credits through a Wetlands Mitigation Council of New Jersey approved wetland bankers stated in Section 4.13 Wetlands, page 14-341 Options 1-3.

As far as the Wetland Mitigation Bank Phase I operated by C&C Builders LLC and located on a 180.00 acre parcel in Fairfield Township, Essex County, the bank received a total of 54.40 mitigation credits for freshwater wetland creation and enhancement activities. The contact for the bank is Carmine Xanopoulos from C&C Builders and he may be reached at (973) 276-0080. However it is our understanding that this bank has no credits available for sale at this time so you may want to investigate other wetland bankers in the New Jersey area.